

1 Maija M. Druffel, WSBA #43314
2 Robert F. Greer, WSBA #15619
3 Megan C. Clark, WSBA #46505
4 Etter, M^cMahon, Lamberson,
5 Van Wert & Oreskovich, P.C.
6 618 West Riverside Avenue, Suite 210
7 Spokane, WA 99201
8 Telephone: 509-747-9100
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10 Attorneys for Plaintiffs

HONORABLE MARY K. DIMKE

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13 IN THE UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF WASHINGTON
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16 ANDREW ERICKSON, individually,
17 and CRAIG BELFIELD, individually,

NO. 1:23-cv-03118 MKD

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19 Plaintiffs,

PLAINTIFFS' LIST OF TRIAL
WITNESSES

20 vs.

21 ENVIRO TECH CHEMICAL
22 SERVICES, INC., a California
23 Corporation, d/b/a Organiclean,
24

25 Defendant.
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27 Plaintiffs Andrew Erickson and Craig Belfield ("Plaintiffs"), by and
28 through their attorneys of record, Maija M. Druffel, Megan C. Clark and Robert
29 F. Greer, of Etter, McMahon, Lamberson, Van Wert & Oreskovich, P.C.,
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pursuant to Court Order (ECF No. 58), hereby submits the following list of trial witnesses:

I. LAY WITNESSES

Plaintiffs intends to call the following lay witnesses at the time of trial:

1. Andrew Erickson
c/o Etter, McMahon, Lamberson, Van Wert & Oreskovich, P.C.
618 West Riverside Avenue, Suite 210, Spokane, Washington 99201
(509) 747-9100

Mr. Erickson is one of the Plaintiffs in this matter. He has personal knowledge of the claims and allegations asserted in the Second Amended Complaint (“SAC”).

2. Craig Cleveringa
c/o Etter, McMahon, Lamberson, Van Wert & Oreskovich, P.C.
618 West Riverside Avenue, Suite 210, Spokane, Washington 99201
(509) 747-9100

Mr. Cleveringa is one of the Plaintiffs in this matter. He has personal knowledge of the claims and allegations asserted in the SAC.

3. Jerry Jones
c/o Etter, McMahon, Lamberson
Van Wert & Oreskovich, P.C.
618 West Riverside Avenue, Suite 210
Spokane, WA 99201
(509) 747-9100

Mr. Jones is the former owner of PME, which company he sold to

1 Plaintiff. He has knowledge of Mr. Duran's employment with PME and,
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3 subsequently, Plaintiff. Mr. Jones' knowledge includes, but is not limited to,
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5 development of customer accounts, work logistics, job duties, and industry
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7 standards. Mr. Jones also has knowledge of Plaintiff's operations, finances, and
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9 customer relations, as well as the details relating to the sale of PME to Plaintiff.

10 Mr. Jones was deposed by Defendants and his testimony is further detailed
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12 therein.

13 4. Brett Jansen
14 c/o Etter, McMahon, Lamberson, Van Wert & Oreskovich, P.C.
15 618 West Riverside Avenue, Suite 210, Spokane, Washington 99201
16 (509) 747-9100
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19 Ms. Jansen worked as an employee of the OrganiClean Partnership.
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21 She has personal knowledge of the claims and allegations asserted in the SAC,
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23 including: the partnership agreement with Defendants; the development,
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25 marketing and sale of the OrganiClean Products; the trademark protection over
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27 the OrganiClean Products and the use permitted thereby; and the Defendants
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29 breach of the partnership agreements and infringement of the trademarks
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1 5. Alexander Olsen
2 c/o Etter, McMahon, Lamberson, Van Wert & Oreskovich, P.C.
3 618 West Riverside Avenue, Suite 210, Spokane, Washington 99201
4 (509) 747-9100

5 Mr. Olsen worked as an employee of the OrganiClean Partnership.
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7 He has personal knowledge of the claims and allegations asserted in the SAC,
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9 including: the partnership agreement with Defendants; the development,
10 marketing and sale of the OrganiClean Products; the trademark protection over
11 the OrganiClean Products and the use permitted thereby; and the Defendants
12 breach of the partnership agreements and infringement of the trademarks.
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17 6. Trinity Hammond
18 CPA, Director of Finance
19 Enviro Tech, an Arxada Company
20 500 Winmoore Way, Modesto, CA 95358

21 Ms. Hammond was or is the Director of Finance at Defendant
22 Enviro Tech. She is believed to have information and knowledge regarding the
23 OrganiClean Partnership; the agreement to split profits; establishing the d/b/a of
24 OrganiClean; establishing a bank account to deposit the net profits from sales
25 of OrganiClean products; and the financial conditions of the OrganiClean
26 Partnership and the profits received by Defendant for the sale of the
27 OrganiClean Products.
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1 7. Brent Bankosky
2 Vice President
3 Enviro Tech, an Arxada Company
4 500 Winmoore Way, Modesto, CA 95358

5 Mr. Bankosky is or was the Vice President of Defendant Enviro
6 Tech. He is believed to have information and knowledge regarding the
7 OrganiClean Partnership; the agreement to split profits; establishing the d/b/a of
8 OrganiClean; establishing a bank account to deposit the net profits from sales
9 of OrganiClean products; and the financial conditions of the OrganiClean
10 Partnership; and the profits received by Defendant for the sale of the
11 OrganiClean Products.
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17 8. Jon Howarth
18 Senior Vice President Technology
19 Enviro Tech, an Arxada Company
20 500 Winmoore Way, Modesto, CA 95358
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22 Mr. Howarth was or is the Senior Vice President of Technology of
23 Defendant Enviro Tech. He is believed to have information and knowledge
24 regarding the OrganiClean Partnership; the OrganiClean Products; the financial
25 conditions of the OrganiClean Partnership; and the profits received by Defendant
26 for the sale of the OrganiClean Products.
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1 9. Aaron Harvey
2 Enviro Tech, an Arxada Company
3 500 Winmoore Way, Modesto, CA 95358

4 Mr. Aaron Harvey was or is an employee of Defendant Enviro Tech.

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6 He is believed to have information and knowledge regarding the OrganiClean
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8 Partnership; the agreement to split profits; establishing the d/b/a of
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10 OrganiClean; establishing a bank account to deposit the net profits from sales
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12 of OrganiClean products; and the financial conditions of the OrganiClean
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14 Partnership and the profits received by Defendant for the sale of the
15 OrganiClean Products.

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17 10. Brian Harvey
18 Corporate Sales Manager
19 Enviro Tech, an Arxada Company
20 500 Winmoore Way, Modesto, CA 95358

21 Mr. Brian Harvey was or is the Corporate Sales Manager of
22
23 Defendant Enviro Tech. He is believed to have information and knowledge
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25 regarding the OrganiClean Partnership; the agreement to split profits;
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27 establishing the d/b/a of OrganiClean; establishing a bank account to deposit
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29 the net profits from sales of OrganiClean products; and the financial conditions
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31 of the OrganiClean Partnership and the profits received by Defendant for the
32 sale of the OrganiClean Products.

1 11. Rich Silveira
2 Supply Chain Director
3 Enviro Tech, an Arxada Company
4 500 Winmoore Way, Modesto, CA 95358

5 Mr. Silveira was or is the Supply Chain Director of Defendant Enviro
6 Tech. He is believed to have information and knowledge regarding the
7 OrganiClean Partnership; the agreement to split profits; establishing the d/b/a of
8 OrganiClean; establishing a bank account to deposit the net profits from sales
9 of OrganiClean products; and the financial conditions of the OrganiClean
10 Partnership and the profits received by Defendant for the sale of the
11 OrganiClean Products.
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18 12. Naomi Aguillar
19 Customer Service Director
20 Enviro Tech, an Arxada Company
21 500 Winmoore Way, Modesto, CA 95358

22 Ms. Aguillar was or is the Customer Service Director of Defendant Enviro
23 Tech. She is believed to have information and knowledge regarding the
24 OrganiClean Partnership; the agreement to split profits; establishing the d/b/a of
25 OrganiClean; establishing a bank account to deposit the net profits from sales of
26 OrganiClean products; and the financial conditions of the OrganiClean
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1 Partnership and the profits received by Defendant for the sale of the OrganiClean
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3 Products.

4 13. Tina Texeira
5 Enviro Tech, an Arxada Company
6 500 Winmoore Way, Modesto, CA 95358
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8 Ms. Texeira was or is an employee of Defendant Enviro Tech. She is
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10 believed to have information and knowledge regarding the OrganiClean
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12 Partnership; the agreement to split profits; establishing the d/b/a of OrganiClean;
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14 establishing a bank account to deposit the net profits from sales of OrganiClean
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16 products; and the financial conditions of the OrganiClean Partnership and the
17 profits received by Defendant for the sale of the OrganiClean Products.

18 14. Ray Coen
19 Enviro Tech, an Arxada Company
20 500 Winmoore Way, Modesto, CA 95358
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22 Mr. Coen was or is an employee of Defendant Enviro Tech. He is believed
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24 to have information and knowledge regarding the OrganiClean Partnership; the
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26 agreement to split profits; establishing the d/b/a of OrganiClean; establishing a
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28 bank account to deposit the net profits from sales of OrganiClean products; and
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30 the financial conditions of the OrganiClean Partnership and the profits received
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32 by Defendant for the sale of the OrganiClean Products.

1 15. Jane Smith
2 Enviro Tech, an Arxada Company
3 500 Winmoore Way, Modesto, CA 95358

4 Ms. Smith was or is an employee of Defendant Enviro Tech. She is believed
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6 to have information and knowledge regarding the OrganiClean Partnership; the
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8 agreement to split profits; establishing the d/b/a of OrganiClean; establishing a
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10 bank account to deposit the net profits from sales of OrganiClean products; and
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12 the financial conditions of the OrganiClean Partnership and the profits received
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14 by Defendant for the sale of the OrganiClean Products.

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16 16. Lindsay Gaarde
17 Organic Certification and EPA Compliance Director
18 Enviro Tech, an Arxada Company
19 500 Winmoore Way, Modesto, CA 95358

20 Ms. Gaarde was or is an employee of Defendant Enviro Tech. She is
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22 believed to have information and knowledge regarding the OrganiClean
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24 Partnership; the agreement to split profits; establishing the d/b/a of OrganiClean;
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26 establishing a bank account to deposit the net profits from sales of OrganiClean
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28 products; and the financial conditions of the OrganiClean Partnership and the
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30 profits received by Defendant for the sale of the OrganiClean Products.

1 17. Stephanie Paulido
2 Enviro Tech, an Arxada Company
3 500 Winmoore Way, Modesto, CA 95358

4 Ms. Paulido was or is an employee of Defendant Enviro Tech. She is
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6 believed to have information and knowledge regarding the OrganiClean
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8 Partnership; the agreement to split profits; establishing the d/b/a of OrganiClean;
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10 establishing a bank account to deposit the net profits from sales of OrganiClean
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12 products; and the financial conditions of the OrganiClean Partnership and the
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14 profits received by Defendant for the sale of the OrganiClean Products.
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16 18. Teena Ortiz
17 Enviro Tech, an Arxada Company
18 500 Winmoore Way, Modesto, CA 95358

19 Ms. Ortiz was or is an employee of Defendant Enviro Tech. She is believed
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21 to have information and knowledge regarding the OrganiClean Partnership; the
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23 agreement to split profits; establishing the d/b/a of OrganiClean; establishing a
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25 bank account to deposit the net profits from sales of OrganiClean products; and
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27 the financial conditions of the OrganiClean Partnership and the profits received
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29 by Defendant for the sale of the OrganiClean Products.
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1 19. Maddison Flanders
2 Enviro Tech, an Arxada Company
3 500 Winmoore Way, Modesto, CA 95358

4 Ms. Flanders was or is an employee of Defendant Enviro Tech. She is
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6 believed to have information and knowledge regarding the OrganiClean
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8 Partnership; the agreement to split profits; establishing the d/b/a of OrganiClean;
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10 establishing a bank account to deposit the net profits from sales of OrganiClean
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12 products; and the financial conditions of the OrganiClean Partnership and the
13 profits received by Defendant for the sale of the OrganiClean Products.
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15 20. Carley Thompson
16 Regulatory Affairs Specialist
17 Enviro Tech, an Arxada Company
18 500 Winmoore Way, Modesto, CA 95358

19 Ms. Thompson was or is an employee of Defendant Enviro Tech. She is
20
21 believed to have information and knowledge regarding the OrganiClean
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23 Partnership; the agreement to split profits; establishing the d/b/a of OrganiClean;
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25 establishing a bank account to deposit the net profits from sales of OrganiClean
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27 products; and the financial conditions of the OrganiClean Partnership and the
28 profits received by Defendant for the sale of the OrganiClean Products.
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II. EXPERT WITNESSES

1. Scott H. Martin, CPA/ABV,ASA
9.S Washington ST., Suite 600
Spokane, WA 99201
509-323-0272

Mr. Martin is a forensic economist who has analyzed and calculated Plaintiffs' lost profits and other damages sustained by Mr. Erickson and Mr. Belfield in they claim against Enviro Tech Chemical Service. Mr. Martins's opinions have been expressed in two reports, dated November 14, 2024 and March 11, 2025, respectively, copies of which reports have been provided to Defendants.

RESPECTFULLY SUBMITTED this 15th day of August 2025.

ETTER, MCMAHON, LAMBERSON,
VAN WERT & ORESKOVICH, P.C.

/s/ Maija M. Druffel

Maija M. Druffel, WSBA #43314
Robert F. Greer, WSBA #15619
Megan C. Clark, WSBA #46505

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice.

Signed this 15th day of August 2025 in Spokane, WA.

By: /s/ Maija M. Druffel
Maija M. Druffel